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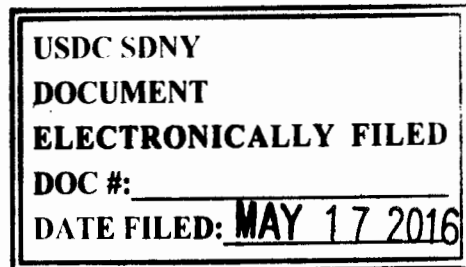
ROBERT CALIENDO
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* ADMITTED IN NY & NJ

May 16, 2016

BY ECF

The Honorable Katherine B. Forrest
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: United States v. Darcy Wedd, 15 Cr 616 (KBF)

Your Honor:

I write to respectfully request an enlargement of Mr. Wedd's travel conditions which will permit him to travel to Atlantic City, New Jersey, this Friday, May 20, 2016, remain overnight, and return to New York City on May 21, 2016.

Background

In accordance with an Order issued on December 11, 2015, the defendant's bail conditions are, in pertinent part, as follows:

1. A \$500,000 personal recognizance bond, co-signed by 2 financially responsible persons and secured by property with equity value of at least \$500,000.
2. The defendant shall submit to supervision by and report for supervision to Pretrial Services for the Southern District of New York. The defendant is to report once per week by phone and once per month in person, unless these requirements are modified by Pretrial Services.
3. The defendant is permitted to travel within the Southern and Eastern Districts of New York. The defendant may travel between the Southern and Eastern Districts of New

York and the Central District of California and the District of Nevada (and intermediate points necessary for travel) with the prior approval of Pretrial Services and prior notification to the United States Attorney's Office. All other travel outside of the Southern and Eastern Districts of New York must be pre-approved by Pretrial Services, the United States Attorney's Office and the Court.

The Basis For The Instant Application

Mr. Wedd wishes to attend the performance of a friend who is a DJ. Pretrial Officer Tiffany Francis and AUSA Christian Everdell both consent to this request. A proposed travel itinerary has been provided to Pretrial Services and the government.

Conclusion

For the reasons set forth herein, we respectfully request that the defendant's application for a bail modification be approved.

Most respectfully,

/s/

Maurice H. Sercarz

cc: AUSA Christian Everdell (by ECF)

Tiffany Francis, U.S. Pretrial Officer (by email)

So ordered.
/s/ [Signature]
USDS
5/17/16